

# EXHIBIT 1

**From:** [Rakesh Kilaru](#)  
**To:** [Congdon, James \(ATR\)](#); [Hughes, Jared A. \(ATR\)](#); [Tarlov, Yvette \(ATR\)](#)  
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**Subject:** [EXTERNAL] Follow up re: House settlement  
**Date:** Tuesday, January 14, 2025 11:24:20 AM

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Hi James, Jared, and Yvette:

Following up on your phone call last week and our discussions, I am providing the following in writing (and copying the conference counsel who were on our call).

The *House* defendants agree that the *House* settlement does not provide immunity from a later action by DOJ. Defendants do, however, retain all rights to rely on the settlement and potential court approval thereof in any such action, including as a defense to liability.

Thanks,  
Rakesh

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Pronouns: He/Him/His

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